

Exhibit 1

Hang Le

From: Hang Le
Sent: Wednesday, December 6, 2023 2:16 PM
To: Shannon Gustafson; Diana Esquivel; Amy R. Margolies; Karen Slyapich
Cc: Jeanette M. Cuevas; Dale Galipo; Christine Garske; Anita K. Clarke
Subject: RE: L.C. (Puga), et al v. State of California, et al - Depositions
Attachments: 12.06.2023 - Stip to Modify Scheduling Order.docx; 12.06.2023 - Stip to Modify Scheduling Order [PO].docx

Let's tentatively agree on the week of February 12, with the understanding that it's subject to the officers' and Shannon's availability and that we'll meet and confer on alternative dates should the need arise.

Attach is draft of the Stip and Proposed Order. Please review and make any edits you see fit. If there are no changes to be made, please e-mail me with your permission to e-sign on your behalf. Thanks.

Best,
Hang

Hang D. Le, Esq. | Law Offices of Dale K. Galipo | 21800 Burbank Blvd., Suite 310, Woodland Hills, CA 91367 | Office: +1.818.347.3333 | Fax: +1.818.347.4118 | Email: hlee@galipolaw.com

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From: Shannon Gustafson <sgustafson@lynberg.com>
Sent: Wednesday, December 6, 2023 12:59 PM
To: Diana Esquivel <Diana.Esquivel@doj.ca.gov>; Hang Le <hlee@galipolaw.com>; Amy R. Margolies <camargolies@lynberg.com>; Karen Slyapich <kslyapich@galipolaw.com>
Cc: Jeanette M. Cuevas <jcuevas@lynberg.com>; Dale Galipo <dalekgalipo@yahoo.com>; Christine Garske <Christine.Garske@doj.ca.gov>; Anita K. Clarke <aclarke@lynberg.com>
Subject: RE: L.C. (Puga), et al v. State of California, et al - Depositions

We are agreeable to continue the trial date to January 2025

As for week of February 12, I currently have a trial set that week. I don't think it will go as scheduled but then again those are famous last words.

SHANNON GUSTAFSON
Off: [714-937-1010](tel:714-937-1010) Fax: [714-937-1003](tel:714-937-1003)

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From: Diana Esquivel <Diana.Esquivel@doj.ca.gov>
Sent: Wednesday, December 6, 2023 10:43 AM
To: Hang Le <hlee@galipolaw.com>; Amy R. Margolies <amargolies@lynberg.com>; Karen Slyapich <kslyapich@galipolaw.com>
Cc: Jeanette M. Cuevas <jcuevas@lynberg.com>; Dale Galipo <dalekgalipo@yahoo.com>; Christine Garske <Christine.Garske@doj.ca.gov>; Anita K. Clarke <aclarke@lynberg.com>; Shannon Gustafson <sgustafson@lynberg.com>
Subject: RE: L.C. (Puga), et al v. State of California, et al - Depositions

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Good morning,

I'm available the entire week of Feb. 12-16. I'll wait for the County Defs to confirm their availability before I check with my officers, but I don't anticipate any conflicts at this time.

Also, I'm available for trial any time after October 2024, so a continuance of the trial to Jan 2025 or after is fine with me.

Thanks,

-Diana

Diana Esquivel
Deputy Attorney General
TORT & CONDEMNATION SECTION
Office of the Attorney General
Tel: (916) 210-7320
Fax: (916) 322-8288
Email: Diana.Esquivel@doj.ca.gov

From: Hang Le <hlee@galipolaw.com>
Sent: Wednesday, December 6, 2023 10:05 AM
To: Amy R. Margolies <amargolies@lynberg.com>; Karen Slyapich <kslyapich@galipolaw.com>; Diana Esquivel <Diana.Esquivel@doj.ca.gov>
Cc: Jeanette M. Cuevas <jcuevas@lynberg.com>; Dale Galipo <dalekgalipo@yahoo.com>; Christine Garske <Christine.Garske@doj.ca.gov>; Anita K. Clarke <aclarke@lynberg.com>; Shannon Gustafson <sgustafson@lynberg.com>
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Hi all,

I appreciate the cooperation and continued courtesy in scheduling the depositions of the involved officers. Unfortunately, Dale and I are in trial the week of January 22-26. We are available the week of February 12-16 for the

officer depositions. However, taking the depositions of the officers close to the all-discovery cutoff would not give our experts the information necessary for them to provide complete opinions in this case, given that the current initial expert disclosures deadline is January 22, 2024. Thus, in order to accommodate the continued depositions, we will need to continue the pretrial and trial dates. Dale's earliest availability for trial is January 13, 2025. If that date works for everyone, I will send over a Stip and Proposed Order. Thanks.

Best,
Hang

Hang D. Le, Esq. | Law Offices of Dale K. Galipo | 21800 Burbank Blvd., Suite 310, Woodland Hills, CA 91367 | Office:
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From: Amy R. Margolies <amargolies@lynberg.com>
Sent: Tuesday, December 5, 2023 1:06 PM
To: Hang Le <hlee@galipolaw.com>; Karen Slyapich <kslyapich@galipolaw.com>; Diana Esquivel <Diana.Esquivel@doj.ca.gov>
Cc: Jeanette M. Cuevas <jcuevas@lynberg.com>; Dale Galipo <dalekgalipo@yahoo.com>; Christine Garske <Christine.Garske@doj.ca.gov>; Anita K. Clarke <aclarke@lynberg.com>; Shannon Gustafson <sgustafson@lynberg.com>
Subject: RE: L.C. (Puga), et al v. State of California, et al - Depositions

Hang and Diana,

Thank you for the quick responses and my sincere apologies for the misunderstanding; we would appreciate new dates given the circumstances. We understand Plaintiff wanting alternate dates before taking them off calendar. Shannon Gustafson, Sgt. Vaccari, and Deputy Adams are all free as of now for the entire week of January 22-January 26. Are there any dates that week that would work for you both?

Thank you,

AMY R. MARGOLIES
Off: [714-937-1010](tel:714-937-1010) Fax: [714-937-1003](tel:714-937-1003)

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To: Amy R. Margolies <amargolies@lynberg.com>; Karen Slyapich <kslyapich@galipolaw.com>; Diana Esquivel <Diana.Esquivel@doj.ca.gov>

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Hi Amy,

There appears to be a misunderstanding. Diana only requested that CHP Blackwood and Kee's depositions be rescheduled. It is our understanding that CHP Rubalcava's deposition is still going forward. Additionally, County's Vaccari's deposition is scheduled for an entirely different day than any of the CHP officers. Unless there is another reason why the depositions cannot move forward, the depositions of Rubalcava, Adams, and Vaccari should move forward as previously scheduled. If there is a reason, we request that you provide us with firm alternative dates before those depositions are taken off calendar. Thank you.

Best,
Hang

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From: Amy R. Margolies <amargolies@lynberg.com>

Sent: Tuesday, December 5, 2023 12:04 PM

To: Karen Slyapich <kslyapich@galipolaw.com>; Hang Le <hlee@galipolaw.com>; Diana Esquivel <Diana.Esquivel@doj.ca.gov>

Cc: Jeanette M. Cuevas <jcuevas@lynberg.com>; Dale Galipo <dalekgalipo@yahoo.com>; Christine Garske <Christine.Garske@doj.ca.gov>; Anita K. Clarke <aclarke@lynberg.com>; Shannon Gustafson <sgustafson@lynberg.com>

Subject: RE: L.C. (Puga), et al v. State of California, et al - Depositions

Good morning Karen,

Thank you for reaching out on this matter. Our office was understanding that the depositions would be continued based on the rescheduling needs of CHP, especially since CHP's Rubalcava was scheduled for the same day as County's Adams.

We will certainly work with all counsel on new dates.

Thank you,

AMY R. MARGOLIES

Off: [714-937-1010](#) Fax: [714-937-1003](#)

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From: Karen Slyapich <kslyapich@galipolaw.com>

Sent: Tuesday, December 5, 2023 11:55 AM

To: Diana Esquivel <Diana.Esquivel@doj.ca.gov>; Shannon Gustafson <sgustafson@lynberg.com>; Hang Le <hlee@galipolaw.com>; Amy R. Margolies <amargolies@lynberg.com>; Anita K. Clarke <aclarke@lynberg.com>

Cc: Jeanette M. Cuevas <jcuevas@lynberg.com>; Dale Galipo <dalekgalipo@yahoo.com>; Christine Garske <Christine.Garske@doj.ca.gov>

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Good morning,

I am writing to ask your confirmation that the depositions set for December 12, 2023 for Mr. Rubacalva at 10:00 and Mr. Adams at 1:30, as well as the deposition set for December 13, 2023 at 10:00 for Mr. Vaccari will be proceeding.

Thank you,
Karen Slyapich

Karen Slyapich, Litigation Assistant | The Law Offices of Dale K. Galipo | 21800 Burbank Blvd., Suite 310, Woodland Hills, CA 91367 | Office: +1.818.347.3333 | Fax: +1.818.347.4118 | Email: kslyapich@galipolaw.com

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